

From: Kelly Wright [kwright@sbtribes.com]
Sent: Monday, December 02, 2013 3:37 PM
To: Rochlin, Kevin
Cc: Jennings, Jannine; Sheldrake, Beth; Virginia Monsisco; susanh@ida.net
Subject: RE: Tribes comments

Categories: 11-19 to 1-10 2014

Kevin and Jannine, so the Tribes would like to see additional groundwater sampling be conducted for both Simplot and FMC. Both facilities do a limited analyses on them in accordance with the appropriate documents. By doing an expanded list on groundwater, Tribes believe that with the FMC IRODA treating groundwater that this will be impacting the quality of groundwater. In order to properly verify that cleanup is working, a broad base of chemicals should be evaluated so trends and assumptions are adequately documented. Along with the FMC proposed cleanup process, Simplot has identified a new source underneath their facility that is also going to be going through a pilot study.

Thus, the Tribes are requesting that we be allowed to prepare a QAPP/SAP then during the 3rd or 4th Quarter depending upon the timeframe needed for reviewing and comment/resolution to signature will be the final determining factor.

So I am providing another draft of the FMC Cooperative Agreement with the understanding that each OU would require their own documentation. This will be modified again to reduce the amount of labor hours needed to support developing three different QAPPs unless EPA is not approving the idea that additional samples need to be collected.

The Off-site component the Tribes will be providing data shortly where data has elevated concentration of various constituents that were collected for vegetation and soil levels within the Reservation. Chromium was one that stood out that I can remember seeing in the vegetation also noted some radiological constituents as well. Thus the rationale that additional sampling needs to be performed.

So what sort of more details would EPA like to see so we can include them into this year's sampling. If not then let me know and we could work on a generic EMF sampling to include all things and simply do an addendum if approved later.

Thanks
kelly

From: Rochlin, Kevin [<mailto:rochlin.kevin@epa.gov>]
Sent: Monday, December 02, 2013 1:43 PM
To: Kelly Wright
Cc: Jennings, Jannine
Subject: RE: Tribes comments

Kelly,

I coordinated with Jannine about your question:

- 1) EPA is looking for a proposal for any sampling the Tribes are contemplating prior to approving the cost for sampling.
- 2) Once EPA has approved the Tribes request, the Tribes will prepare a SAP/QAPP for the sampling.
- 3) The SAP/QAPP may be prepared for the entire EMF site with the costs appropriately apportioned between the activities.

Let me know if you need any more info.

Kevin

From:

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From: Kelly Wright [<mailto:kwright@sbtribes.com>]
Sent: Monday, December 02, 2013 11:46 AM
To: Rochlin, Kevin
Subject: RE: Tribes comments

Kevin, I am still working on the Cooperative Agreement for FMC. What I need to find out is, can the Tribes write one QAPP for EMF or are we supposed to be developing individual ones for the 3 components of the EMF?

Thanks
Kelly

From: Rochlin, Kevin [<mailto:rochlin.kevin@epa.gov>]
Sent: Monday, December 02, 2013 12:44 PM
To: Kelly Wright
Subject: RE: Tribes comments

Got them.

Thanks.

Kevin

From:

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From: Kelly Wright [<mailto:kwright@sbtribes.com>]
Sent: Monday, December 02, 2013 11:32 AM
To: Rochlin, Kevin
Cc: susanh@ida.net; Virginia Monsisco
Subject: Tribes comments

Kevin as promised, here are our comments:

- **Response 2:** The Tribes request an expanded Field analyses to include all COC rather than indicator constituents on a specified number of samples.
- **Response 8:** Why is FMC resisting to using a roto-sonic drilling method? FMC calls out Air rotary casing hammer or percussion drilling methods why does EPA want one over the other?
- **Response 12:** Tribes do not agree with waste determination based on process knowledge. Sampling and analyses should be followed and include all chemicals of concern as well as radiological parameters. Specific details should be provided on how and where water will be used on site prior to any discharges.

Shoshone- Bannock Tribes specific comments/ responses:

The Tribes maintain their position on General Comment. We reserve the right to re-evaluate the groundwater model report and assumptions derived from that report including parameters selected for flow and contaminant transport models, assess reasonableness of predicted parameters, and gain better understanding of sorption coefficients, dispersivity and porosity.

The Tribes maintain production wells, irrigation wells and other wells within a defined radius should be monitored during step draw down testing.

Second bullet section 2.1.4. Tribes maintain this statement should be added. The statement is accurate.

The Tribes maintain their request on sampling prior to any water being discharged on Tribal lands or State lands. The Tribes do not agree with FMC response that aluminum, antimony, beryllium, cadmium, copper, lead, molybdenum, mercury, silver, thallium, zinc, organic compounds, and radionuclides are not FMC related contaminants. The Tribes believe these are FMC related contaminants as shown historically in the sampling efforts

Thanks for providing us an opportunity to provide our comments.

Kelly C. Wright